

November 5, 2003

(AR-18J)

Raj Vakharia, Review Engineer
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Vakharia:

This letter is in regards to the United States Environmental Protection Agency (USEPA) review of Wisconsin Department of Natural Resources (WDNR) air pollution control permit number 03-RV-166 and 03-RV-166-OP for Elm Road Generating Station in Oak Creek, Wisconsin. This draft permit is for a request for the construction and operation of an electric generating facility.

This construction permit requires a case-by-case Maximum Available Control Technology (MACT) analysis, pursuant to Section 112(g) of the Clean Air Act. The construction of this source will have in and of itself the potential to emit 10 tons per year (TPY) of any individual Hazardous Air Pollutant (HAP) or 25 TPY of any combination of any HAPs. Because potential HAP emissions exceed 25 TPY, (at 200 TPY) the proposed project is subject to case-by-case MACT requirements. A high percentage of HAP emissions are due to emissions of Hydrogen Chloride (HCL). In fact, each of the two proposed pulverized coal boilers will have the potential to emit approximately 63 TPY of HCL. The draft construction permit states that MACT for HCL will be met by complying with and meeting the SO₂ emission limit. USEPA recommends including a numerical limit in pounds per hour for HCL, such as the limit of 15.8 lbs/hr, which is achieved with a 97% control efficiency for each pulverized coal boiler, to comply with the case-by-case MACT requirement.

If this concern, or any other comments raised during the public comment period, were addressed in a response to comments document prepared by the WDNR, we request a copy of that document.

If you have any further questions, please feel free to contact me, or have your staff contact Susan Siepkowski (312) 353-2654.

Sincerely yours,

/s/

Pamela Blakley, Chief
Air Permits Section

cc's: Jeffrey C. Hanson, Supervisor
 Permits and Stationary Modeling Section
 Wisconsin Department of Natural Resources